**BLACK & VEATCH Waste Science, Inc.**

101 North Wacker Drive, Suite 1100, Chicago, Illinois 60606, (312) 346-3775, Fax: (312) 346-4781

USEPA Region V
FSIP (32-5JZZ)

BVWS Project 71380.114
BVWS File C.4
February 9, 1995

Mr. Tom Moran
Phibro-Tech, Inc.
1 Parker Plaza
Fort Lee, New Jersey
07024

Subject: Diamond International
Corporation
Peotone Rd.
Wilmington, Illinois
CERCLIS ID No. ILD 980683197

Dear Mr. Moran:

The U.S. Environmental Protection Agency (USEPA) retained Black & Veatch Waste Science (BVWS) to conduct a site reconnaissance of the Diamond International Corporation site (now known as Phibro-Tech, Inc.) on Friday, February 17, 1995, at 9 a.m. This property has been identified for further study under the USEPA's site assessment program.

Enclosed is a site reconnaissance work sheet. During the reconnaissance visit, BVWS will observe site environmental conditions, interview persons knowledgeable about past and current site activities, and take photographs. Please have the person(s) you designate to be interviewed prepared to provide the type of information contained on the work sheet. A site reconnaissance visit takes approximately 4 hours.

Pending evaluation of data collected during the site reconnaissance, BVWS has scheduled a second site visit to begin on Monday, March 27, 1995, at 8 a.m. to conduct sampling and gather additional information about environmental conditions on and around the site. The sampling effort will include two or three BVWS personnel and last approximately 2 days.

The site reconnaissance and sampling visits are part of a focused site inspection prioritization (FSIP). Also enclosed is a letter of introduction prepared by the USEPA to assure site owners/operators of the legitimacy of these visits and the statutory basis for the inspection. Please direct questions regarding the site inspection to Mr. Alan Altur, USEPA, at 312/886-0390.

Mr. Tom Moran

BVWS Project 71380.114
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FSIP evaluations typically involve collecting and analyzing six to ten groundwater, sediment, surface water, or soil samples. You have the option to receive split environmental samples for analyses by your own laboratory if you provide sample containers to the BVWS team during the sampling visit. Laboratory analysis and sample shipment will be your responsibility.

If you have a question about the schedule for site visits to your property, please contact me at 312/346-3775.

Sincerely,

BLACK & VEATCH WASTE SCIENCE, INC.

A handwritten signature in cursive script, appearing to read "John J. Noyes".

For Steve Mrkvicka

Steve Mrkvicka
Project Manager

vg

Enclosures

1. USEPA letter of introduction
2. Site reconnaissance worksheets
3. BVWS field personnel data

cc: A. Altur, USEPA w/ enclosures
J. Noyes, BVWS w/o enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

LETTER OF INTRODUCTION

This is to certify that the employees of B & V Waste Science and Technology Corp., whose signatures, photographs, and physical descriptions are attached are duly designated contract employees of the U.S. Environmental Protection Agency (EPA). It is requested that, upon presentation of this letter, those selected to work on your site be allowed pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. subsection 9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), Pub. L. 99-499, 100 Stat. 1613 (1986), to enter at all reasonable times any vessel, facility, establishment, or other place or property:

- a. where any hazardous substance or pollutant or contaminant may be or has been generated, stored, treated, disposed of, or transported from; or
- b. from which or to which a hazardous substance or pollutant or contaminant has been or may have been released; or
- c. from which or to which a release of hazardous substance or pollutant or contaminant is or may be threatened; or
- d. where entry is needed:
 - 1. to determine the need for a response; or
 - 2. to determine the appropriate response; or
 - 3. to effectuate a response action; or
 - 4. to monitor an ongoing response.

It is requested that, upon presentation of this letter, the designated BVSWE employees be allowed pursuant to Section 104(e) of SARA to inspect and/or obtain samples from any location of any suspected hazardous substance or pollutant or contaminant. A receipt for any samples taken will be provided, if requested, at the conclusion of the inspection. Upon your request, a portion of each sample will be provided to you to analyze independently at your expense.

It is requested that, upon presentation of this letter, the designated BVWST employees be furnished pursuant to Section 104(e) of SARA information from any person or documents relating to:

- a. the identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility; or
- b. the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility; and
- c. the ability of a person to pay for or perform a cleanup.

In addition, upon reasonable notice, you shall:

- a. grant these employees access at all reasonable times to any vessel, facility, establishment, place, property, or location to inspect and copy all documents or records relating to the above-mentioned matters; or
- b. copy and furnish to these employees all requested documents or records, at your expense.

Information requested pursuant to Section 104 of SARA must be provided to EPA notwithstanding its characterization as confidential or containing trade secrets. Provisions for managing and protecting confidential information are contained in 40 CFR Part 2. Accordingly, please identify any information which you consider to be privileged or confidential so that EPA and its agents may take appropriate protective measures.

However, pursuant to Section 104(e)(7)(E) of SARA, you may not claim that information is entitled to protection as confidential unless you show each of the following:

- (i) you have not disclosed the information to any other person, other than a member of a local emergency planning committee established under Title III of SARA, an officer or employee of the United States or a state or local government, your employee, or a person who is bound by a confidentiality agreement, and such person has taken reasonable measures to protect the confidentiality of such information and intends to continue to take such measures; and
- (ii) the information is not required to be disclosed, or otherwise made available, to the public under any other federal or state law; and
- (iii) disclosure of the information is likely to cause substantial harm to your competitive position; and

(iv) the specific chemical identity, if sought to be protected, is not readily discoverable through reverse engineering.

The following information with respect to any hazardous substance at the facility or vessel shall not be entitled to protection as confidential:

(i) the trade name, common name, or generic class or category of the hazardous substance;

(ii) the physical properties of the substance, including its boiling point, melting point, flash point, specific gravity, vapor density, solubility in water, and vapor pressure at 20 degrees Celsius;

(iii) the hazards to health and the environment posed by the substance, including physical hazards (such as explosion) and potential acute and chronic health hazards;

(iv) the potential routes of human exposure to the substance at the facility, establishment, place or property being investigated, entered, inspected or sampled;

(v) the location of disposal of any waste stream;

(vi) any monitoring data or analysis of monitoring data pertaining to disposal activities;

(vii) any hydrogeologic or geologic data;

(viii) any groundwater monitoring data.



Alan Altur
Work Assignment Manager
Illinois Site Inspections
Site Assessment Section
(312) 886-0390

U.S. EPA ARCS PROGRAM
SITE RECONNAISSANCE WORKSHEET

SITE OWNERSHIP/OPERATOR

Site owner (name, address, telephone number). Detail the chain of ownership.

Number of worker(s) working at site. Name, address, and telephone numbers of those familiar with site operations.

Site identity (physical location, street address, distance from local landmarks).

Name, title, and responsibility to the site of owner/operator representative(s) spoken to during interview.

Determine the local person who can grant access (name, address, telephone number, and relationship to owner/operator) if site is unoccupied.

PRESENCE OF CERCLA REGULATED SUBSTANCES

Bring CERCLA regulated substance list. Determine which CERCLA regulated substances, if any, were used or are presently used at the site and describe how they were used.

Determine the site's RCRA status (large or small quantity generator; treatment, storage, and/or disposal facility) and ID number.

Describe the details of any releases reported to EPA or State for site.

Determine why and how the site is monitored, if at all, by a regulatory agency or municipality.

Ask owner/operator for a copy of analytical data on waste handled at the site (ground water and soil sampling results, MSDS sheets, etc.). Analytical data submitted to IEPA/USEPA are not necessary; these data can be acquired from the regulatory files.

TARGETS

Note location and number of residences existing within 200 feet of the facility. Determine resident's name, address, and phone number.

Determine the proximity of nearest school.

Determine the location (distance from site) and source aquifer of the nearest ground water drinking wells (private, municipal, etc.). Sketch nearby drinking well locations on site map. Get the number of people served by the municipal wells. Determine name, address, and phone number of residents with private wells. Note use of private wells (drinking, irrigation, etc.)

Note the presence of monitoring wells onsite. Ask owner/operator for construction details of all monitoring wells.

ACCESSIBILITY

Sketch the property or obtain a site map from the owner/operator. Mark important features on the map. Determine the site area in acres. Describe the condition of the site's perimeter/property boundaries.

Describe the access barriers to the property from outside, if any. Locate the partial property barriers relative to rest of the site.

Locate access points to property (driveways, gates, etc.), noting those points allowing vehicular access.

Describe natural barriers.

STRUCTURES

Sketch and describe briefly the number and types of buildings on the site. Include the following structures:

- Utilities (power lines, gas lines, water lines, etc.)
- Storage (tanks, bins, silos, etc.)
- Containment (dams, berms, ditches, etc.)
- Disposal (dry wells, waste pits, waste piles, lagoons, etc.)

TRANSPORTATION FACILITIES

Locate paved features such as parking lots and driveways on the map. Include areas where vehicular traffic used unpaved areas. Note the condition of paving.

Note if railroad tracks are on property. Determine what has historically been or presently is shipped from the site. Determine track and right-of-way owner.

TOPOGRAPHY

Describe any natural or man-made depressions on the property. Determine what fluids were or are contained in these depressions.

Look for stressed vegetation.

Describe any natural or developed elevated areas on the property. Describe when the man-made areas were emplaced and the composition. Look for evidence of filling onsite.

Indicate on sketch map general direction(s) of surface drainage. Note if diversions are natural or man-made, and what areas the diversions drain.

Wetlands

Springs or seeps

Ponds (natural)

Perennial streams

Berms

Ditches

Culverts

LAND USE

Determine the land use onsite and adjacent to the site. Note land use variations within 1/4 mile, 1 mile, and 4 miles from the site.

Determine if land use could promote migration of CERCLA regulated substances, if present.

POTENTIAL FOR HAZARDOUS WASTE OCCURRENCE

Describe and sketch any manufactured containers which contain or may have contained CERCLA regulated substances. Indicate type, material composition, condition, markings or labels, and size.

Note and describe any on-site structures which suggest the previous existence of manufactured containers.

Describe any developed surface features that may contain hazardous wastes.

Examine and describe trash piles, dumps, pits, lagoons, sumps, etc. Note if evidence, such as bare ground, discolored or stained soil, ground emitting odors, encrustation, charred areas, etc., indicates the presence of hazardous wastes. Estimate volume or area of waste.

HEALTH AND SAFETY INFORMATION

Determine existence of facility/site in-house emergency alarms and fire escape routes.

Ask permission if the following site facilities may be used by the BVWST sampling team.

- potable water source
- tap water hookup (for filling decontamination equipment)
- on-site telephone accessible during emergency
- fire fighting equipment
- trash containers (for disposing non-hazardous waste)
- toilets

Determine the following local telephone numbers:

- Police/Sheriff
- Fire
- Hospital
- Ambulance
- Emergency

Determine shortest/quickest route from site to nearest hospital.

Determine locations of the two nearest accessible, working pay/private phones. Determine coinage needed to make a call at the pay phone.

Ask owner/operator for permission to use radio communication by BVWST workers during sampling visit.

MISCELLANEOUS

Determine location and hours of operation of nearest Fed Ex office.

EXPLANATION OF SAMPLING CONDITIONS

The second on-site phase of a CERCLIS screening site inspection is the sampling visit. The BVWST sampling team needs approximately two days at your site to sample soil and/or water to be analyzed for the chemical compounds and metals regulated by EPA under CERCLA. The site owner receives a copy of the final Screening Site Inspection Report, which contains analytical results of site samples taken by the BVWST team. If you want portions of any samples taken by BVWST, we are responsible to provide them under the following conditions:

1. You supply your own sample containers, which must meet the EPA Region V Analytical Operations Branch specifications. Write them at 230 South Bearborn Street, Chicago, Illinois 60604 for the specifications. In addition, you supply the iced coolers to transport the samples to your chosen laboratory for analysis; and

2. Cost of analysis by your chosen laboratory must be paid by you.

During sampling, small quantities of excess soil and/or water are produced as well as small quantities of rinse water, detergent solution, and methanol from sampling equipment decontamination. EPA instructs us to return all produced soil and/or water to its point of origin and return the sampled area to original condition as much as possible. The rinse water will be poured into the suspected contaminated areas, as it is greatly reduced in contaminant concentration. However, the detergent solution and the methanol must be held temporarily on site in secure containers (which BVWST provides) until transport of these materials by a licensed hazardous waste hauler under proper manifesting is arranged to either a licensed treatment or disposal facility.

We send two Sampling Conditions Explanation copies. Please provide the information indicated below, sign one copy and give it to the BVWST Team Leader at the time of the reconnaissance and interview. Thank you for your cooperation.

As owner / operator (mark out inappropriate term) of the
site, CERCLIS ID NO. ILD :

1. I want / do not want (mark out inappropriate term) a separate suite
of samples taken by the BVWST Team, and

2. I agree to the temporary holding, if deemed necessary by BVWST, on
the site of materials produced by the sampling procedures until their
removal by a licensed hazardous waste hauler.

Signed _____

Name printed _____

Title _____

Date _____

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Signed _____

Name printed _____

Title _____

Date _____



WASTE SCIENCE AND TECHNOLOGY CORP.



M.A. MASTRÓNARDI

#12783

EMPLOYEE IDENTIFICATION CARD



WASTE SCIENCE AND TECHNOLOGY CORP.



J.J. NOYES

#12705

EMPLOYEE IDENTIFICATION CARD



WASTE SCIENCE AND TECHNOLOGY CORP.



R.J. REINTS

#12718

EMPLOYEE IDENTIFICATION CARD



WASTE SCIENCE AND TECHNOLOGY CORP.



M.K. CASSERLY

#10660

EMPLOYEE IDENTIFICATION CARD



WASTE SCIENCE AND TECHNOLOGY CORP.



Iovinelli, RJ

#14292

EMPLOYEE IDENTIFICATION CARD



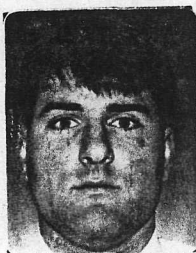
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GRAF, OW

#14504

EMPLOYEE IDENTIFICATION CARD



WASTE SCIENCE AND TECHNOLOGY CORP.



LaVERGHETTA, G

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